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April 10, 2013

Christopher Whyrick
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Mr. Whyrick,

We are in receipt of your Request For Additional Information (RFAI), dated April 9, 2013, regarding the 2012 Year End Report of Crossroads Grassroots Policy Strategies (Crossroads GPS). This Request is the fourth such RFAI we have received on this exact same subject, and we refer you generally to our previous responses of July 19, 2011, and November 29, 2012.

We are quite pleased to see in your most recent RFAI that the disclosure requirement set forth at 11 C.F.R. ? 109.10(e)(1)(vi) is now more accurately paraphrased. You now indicate that "Each contributor who made a donation in excess of \$200 to further the independent expenditures must be itemized on Schedule 5-A, including their identification information." Just as we noted in our previous responses, though, no contributions or donations accepted by Crossroads Grassroots Policy Strategies were solicited or received for the purpose of furthering the reported independent expenditures. Accordingly, no contributions or donations were required to be reported under the regulations cited in the RFAI.

With respect to 11 C.F.R. ? 114.10(f), we refer you to our previous responses: 11 C.F.R. ? 114.10(f) applies to "qualified nonprofit corporations." Crossroads GPS is not, and has never claimed to be, a "qualified nonprofit corporation." If the cited provision has any relevance whatsoever to the reporting of contributions in connection with independent expenditures, it is, by its own terms, inapplicable to Crossroads GPS.

As we have noted before in response to your RFAs, Crossroads GPS is familiar with and understands the applicable reporting regulations. If the organization receives any contributions that are required to be reported pursuant to 11 C.F.R. ? 109.10(e)(1)(vi), those contributions will be reported as required. Your continued RFAs on this subject are unnecessary. However, if you are required by Commission guidelines or procedures to continue to send them, we will continue to respond with the exact same explanation.

Sincerely,

Caleb Crosby
Treasurer
